

AO 91 (Rev. 08/09) Criminal Complaint

Special Agent : Kyle Sise

Telephone: 313-268-0595

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America,

Plaintiff,

v.

Ahkender Maurice Young

Case No.

Case: 2:21-mj-30043

Assigned To : Unassigned

Assign. Date : 1/22/2021

Description: RE: AHKENDER
MAURICE YOUNG (EOB)

Defendant(s).

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of September 2, 2020, in the county of Wayne
in the Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. § 922(g)(1)

Offense Description

Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See attached Affidavit



Continued on the attached sheet.

*Complainant's signature*Kyle Sise, Special Agent*Printed name and title*

Sworn to before me and signed in my presence.

Date: January 22, 2021*Judge's signature*City and state: Detroit, MichiganDavid R. Grand, United States Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Kyle Sise, first being duly sworn, depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), United States Department of Justice, since November 2016, currently assigned to the Detroit Field Division. I am a graduate of the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment as a federal law enforcement officer, I have conducted and participated in several criminal investigations focused on illegal firearms and/or armed drug trafficking violations. Prior to my employment with ATF, I was employed by the Detroit Police Department for approximately seventeen (17) years as a Police Officer.
2. I make this affidavit from personal knowledge based on my participation in this investigation. This information comes from my personal observations, communications with other law enforcement officers, witnesses interviewed by law enforcement, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.
3. The information outlined herein is provided for the limited purpose of establishing probable cause that Ahkender Maurice YOUNG (DOB XX/XX/1983), has violated Title 18 United States Code, Section 922(g)(1), Felon in Possession of a Firearm, and does not contain all details or facts known to law enforcement pertaining to this investigation.

PROBABLE CAUSE

4. I am currently involved in the investigation of a subject identified as Ahkender Maurice YOUNG concerning YOUNG's violation of federal firearms statutes.
5. On September 2, 2020, in the area of Congress St. and Brush St., Detroit Police Department (DPD) officers on routine patrol observed a male subject (later identified as Ahkender Maurice YOUNG) standing on the corner talking to an unknown female. DPD Officer Taylor observed YOUNG look toward Officer Taylor's patrol vehicle then look down toward his right hip, adjusting his T-shirt. Officer Taylor further observed YOUNG take several small steps, turning his body attempting to keep the right side of his body away from the direction of the patrol vehicle. The DPD officers exited the patrol vehicle and walked up to YOUNG. Officer Taylor observed a black gun holster belt clip on the right side waist area of YOUNG. Officer Taylor asked YOUNG if he was carrying a firearm and YOUNG advised that he was carrying a firearm. Officer Taylor asked YOUNG if he had a concealed pistol license, and YOUNG advised that he did not. For officer's safety, Officer Taylor removed the handgun (black Taurus, model G2C, 9mm caliber pistol, serial number ABG656078) from YOUNG's waistband, handing it to his partner. Officer Taylor then arrested YOUNG for carrying a concealed weapon.
6. A review of YOUNG's criminal history revealed numerous criminal convictions, including the below listed felony convictions:
 - 2020 – Felony – Police Officer – Assaulting/ Resisting/ Obstructing, 3rd Circuit CFN: 1900791201FH

- 2018 – Felony (two counts) – Police Officer – Assaulting/ Resisting/ Obstructing, 6th Circuit CFN: 2018265647FH
- 2013 – Felony – Police Officer – Assaulting/Resisting/Obstructing, 6th Circuit CFN: 2012240724FH
- 2013 – Felony – Home Invasion – 3rd Degree, 6th Circuit CFN: 2012241214FH
- 2013 – Felony – Police Officer – Assaulting/Resisting/Obstructing, 6th Circuit CFN: 2013247254FH
- 2003 – Felony (two counts) – Police Officer – Assaulting/Resisting/Obstructing, 6th Circuit CFN: 2002186310FH
- 2003 – Felony – Escape-Juvenile Facility, 6th Circuit CFH: 2001181233FH

7. In addition to his seven felony convictions, between 2002-2020, Young has been convicted of eleven misdemeanors, including Police Officer – Assaulting/Resisting/Obstructing; Domestic Violence; two charges for Assault or Assault and Battery; Domestic Violence and/or Knowingly Assaulting a Pregnant Individual – 2nd Offense Notice; two charges for Operating While Intoxicated; three charges for Operating-License Suspended/ Revoked/ Denied; and one traffic offense. His arrests and felony and misdemeanor offenses occurred in eleven different communities in the Metropolitan Detroit area (Waterford, Dearborn Heights, Pontiac, West Bloomfield, Southfield, Novi, Detroit, Oak Park, Allen Park, River Rouge, and Auburn Hills). Lastly, Young has other pending felony charges: On October 15, 2020, Young was bound over on a charge of Operating While Intoxicated/Impaired – 3rd Offense Notice.

8. ATF Special Agent Kyle Sise consulted with certified firearms Interstate Nexus expert ATF Special Agent Joshua McLean, concerning the manufacture of the above-mentioned black Taurus, model G2C, 9mm caliber pistol, serial number ABG656078. Special Agent McLean stated that the firearm was manufactured

outside the State of Michigan. Therefore it traveled in and affected interstate commerce to reach the State of Michigan.

CONCLUSION

9. Based on the above stated facts, there is probable cause to believe that on September 2, 2020, in the Eastern District of Michigan, defendant Ahkender Maurice YOUNG, having been previously convicted of the above listed Felony offenses, all punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, a black Taurus, model G2C, 9mm caliber pistol, serial number ABG656078, which had been previously shipped and transported in interstate and/or foreign commerce, in violation of Title 18 United States Code, Section 922(g)(1).



Special Agent Kyle Sise
Bureau of Alcohol, Tobacco, Firearms and Explosives

Sworn and subscribed to before me in my presence and/or by reliable electronic means on this 22nd day of January, 2021.



HONORABLE DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE